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April 2, 2020

By ECF

Honorable P. Kevin Castel
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

**Re: United States v. Ramon Ramirez
 19 Cr. 395 (PKC)
 *Request to Submit Interim Vouchers***

Dear Judge Castel:

As the CJA attorney assigned to represent Ramon Ramirez in the above-referenced matter, I write to respectfully request permission to submit interim CJA vouchers. Pursuant to the Court's Revised Plan for Furnishing Representation Pursuant to the Criminal Justice Act (18 U.S.C. §3006A), attorneys serving on the CJA Panel in the Southern District are permitted to file interim vouchers "where it is considered necessary and appropriate." Additionally, according to the CJA eVoucher Attorneys' Manual, requests for interim payment should not be made unless and until an attorney has incurred fees in excess of \$5,000.

This case is in a trial-ready posture and has already necessitated significant litigation. As a result, defense counsel has incurred fees in excess of \$5,000. Moreover, given the current economic climate due to the Coronavirus, counsel submits that payment of a portion of fees earned to date are necessary to assist in day-to-day office expenses and overhead, and appropriate.

Thank you for the Court's consideration.

Respectfully Submitted,

/s/ Matthew J. Kluger
Matthew J. Kluger
Attorney for Ramon Ramirez